

EXHIBIT E

Thea M. Capone
Baumeister & Samuels, P.C.
140 Broadway, 46th Floor
New York, NY 10005
Ph: (212) 363-1200
Fax: (212) 363-1346
www.baumeisterlaw.com



NOTICE: This communication, including attachments, may contain information that is confidential and protected by the attorney/client or other privileges. It constitutes non-public information intended to be conveyed only to the designated recipient(s). If the reader or recipient of this communication is not the intended recipient, an employee or agent of the intended recipient who is responsible for delivering it to the intended recipient, or you believe that you have received this communication in error, please notify the sender immediately by return email and promptly delete this email, including attachments without reading or saving them in any manner. The unauthorized use, dissemination, distribution, or reproduction of this email, including attachments, is prohibited and may be unlawful. Receipt by anyone other than the intended recipient(s) is not a waiver of any attorney/client or other privilege.

From: Pantazis, Dennis G. <dgp@wigginschilds.com>

Sent: Monday, August 12, 2019 5:04 PM

To: Thea M. Capone <TCapone@baumeisterlaw.com>

Cc: Pantazis, Dennis G. <dgp@wigginschilds.com>; Patricia Ryan <patricia.ryan910@gmail.com>; Laura Ryan <lauraryan23@gmail.com>; Colin P. Ryan <colinryan210@gmail.com>; Kristen Ryan <kristen.ryan24@gmail.com>; Fleming, Timothy B. <tfleming@wigginschilds.com>; Rich Hailey <Rich@rameyandhaileylaw.com>; Robert Foote <rmf@fmcolaw.com>; temellon3@aol.com; Todd, Tammy <ttodd@wigginschilds.com>

Subject: RE: Ryan v. Islamic Republic of Iran, et al.; Ryan v. Kingdom of Saudi Arabia, et al.

On July 19, 2019, I sent a letter requesting that you forward to me your files on the Ryan Family. To date, I have not received the requested files, which we need in order to move the Court for our representation. Please let me know when we can expect to receive said files.

Thank you for your assistance. Please call me with any questions.

Dennis G. Pantazis

dgp@wigginschilds.com · Direct:205-314-0531

From: Todd, Tammy

Sent: Friday, July 19, 2019 11:15 AM

To: tcapone@baumeisterlaw.com

Cc: Pantazis, Dennis G. <dgp@wigginschilds.com>; Todd, Tammy <TTodd@wigginschilds.com>; Patricia Ryan <patricia.ryan910@gmail.com>; Laura Ryan <lauraryan23@gmail.com>; Colin P. Ryan <colinryan210@gmail.com>; Kristen Ryan <kristen.ryan24@gmail.com>; Fleming, Timothy B. <tfleming@wigginschilds.com>; Rich Hailey <Rich@rameyandhaileylaw.com>; Robert Foote <rmf@fmcolaw.com>; temellon3@aol.com

Subject: Ryan v. Islamic Republic of Iran, et al.; Ryan v. Kingdom of Saudi Arabia, et al.

See attached letter from Dennis Pantazis re: the Ryan Family.

Thank you,
Tammy

From: Thea M. Capone
Sent: Tuesday, August 13, 2019 3:54 PM
To: Pantazis, Dennis G.
Cc: Fleming, Timothy B.; Rich Hailey; Robert Foote; temellon3@aol.com; Todd, Tammy
Subject: RE: Ryan v. Islamic Republic of Iran, et al.; Ryan v. Kingdom of Saudi Arabia, et al.

Mr. Pantazis -

I am in receipt of your email of last evening, as well as your letter of July 18, 2019 requesting the transfer of our firm's files pertaining to the claims filed by certain members of the Ryan and Maher families against Iran, Saudi Arabia and other defendants. I refer you to my email of April 5, 2019 advising of the need for your firm to file a motion to be substituted as counsel of record for Patty Ryan, Laura Ryan, Colin Ryan, Kristen Ryan, Kathy Maher, Daniel Maher and Joseph Maher. In addition, my email goes on to remind you that the claims for each of these individuals are currently being litigated in the *Ashton* action, and any motion filed by your firm must include the removal of these claims from those of the other *Ashton* plaintiffs.

To aid you in the filing of this motion, I have gone back and recreated a history of the filings done on behalf of these individuals and extracted the appropriate civil action numbers under which such a motion should be filed. The claims for each of the above identified individuals were originally filed on September 10, 2002 in the *Bauer* action (CV-02-07236) naming numerous defendants. The *Bauer* plaintiffs' claims were consolidated into the *Ashton* 1st Amended Master Complaint filed August 1, 2003 (CV-02-06977). On August 21, 2016, the *Ashton* and *Federal Insurance* plaintiffs filed a Consolidated Complaint solely against the Republic of Iran under 28 U.S.C. 1605A (CV-02-06977). Finally, as you are undoubtedly aware, the *Ashton* plaintiffs chose not to be included in the Consolidated Amended Complaint (CAC) filed against the Kingdom of Saudi Arabia on March 17, 2017. Instead, the *Ashton* plaintiffs (including the above identified plaintiffs from the Ryan and Maher families) filed their own Consolidated Complaint against the KSA on March 20, 2017 (CV-17-2003), and we are currently in the process of pursuing the specific claims raised in that Consolidated Complaint in the discovery phase of the litigation.

Since the claims in the CAC and the *Ashton* plaintiffs differ, it will be necessary for your firm to remove claims filed on behalf of Patty Ryan, Laura Ryan, Colin, Ryan, Kristen Ryan, Kathy Maher, Daniel Maher and Joseph Maher from each of the *Ashton* actions. Upon receipt of the Court's Order granting your substitution and the removal of the claims of these individuals from each of the *Ashton* actions, we will arrange to transfer the files related to these claims.

Finally, I believe that the discussion of our firm's lien for the work it has done and the reimbursement of expenses can be deferred until such time as there is a successful outcome of the terror litigation. We would appreciate, however, your acknowledgement and acceptance of such a lien.

We look forward to receiving a copy of an Order substituting your firm as counsel for the individuals identified from the Ryan and Maher families, and to working with you on the transfer of files.

Thea Capone